R E M A R K S

In the Office Action dated January 5, 2005, claims 14, 17, 18 and 20 were objected to because their term "product" was used at a number of locations at which it was apparent that the term "work routine" was intended. Those claims have been amended to consistently use the term "work routine" throughout.

Claims 1-20 were rejected under 35 U.S.C. §102(e) as being anticipated by Ayyadurai.

Each of independent claims 1, 8, 13 and 18 has been amended to include a scanning step, or state that the central database comprises a scanner, for scanning the message that is stored in the central database in order to identify predefined terms therein. Dependent on the result of this scanning, the message is forwarded to a predefined address.

Therefore, the subject matter of dependent claim 4 is now embodied in independent claim 1, the subject matter of dependent claim 9 is now embodied in independent claim 8, the subject matter of dependent claim 16 is now embodied in independent claim 13, and the subject matter of claim 19 is now embodied in claim 18. Only the rejections of those original dependent claims 4, 9, 16 and 19, therefore, need to be addressed herein. In substantiating the rejection of those original dependent claims, the Examiner relied on language at column 5, lines 24-59 of the Ayyadurai reference.

Applicant acknowledges that this passage of the Ayyadurai reference provides a general teaching to analyze the content of a large number of emails can be appropriately clustered. Although not cited by the Examiner,

Applicant notes that the Ayyadurai reference states that dependent on the properties of the messages analyzed in this manner, one-to-many routing by company division, department and individual can take place (Ayyadurai, column 6, lines 38-39).

Nevertheless, Applicant respectfully submits the Ayyadurai reference does not disclose the use of such scanning (analysis) and automated routing in the context of the subject matter of the independent claims of the present application, wherein the information that is received and processed in accordance with the claims is obtained from an electronic form that is provided to customers or consumers of a particular product or work routine. The method and apparatus disclosed in the Ayyadurai reference are simply for the purpose of analyzing the huge amount of emails and other types of electronic messages that arrive at a facility on a daily basis. The Ayyadurai reference is completely silent, and is not concerned with, how the incoming information is generated. The Ayyadurai reference simply provides a method and apparatus for dealing with a large amount of incoming information, from various random and non-uniform sources.

In each of the independent claims of the present application, by contrast, an electronic form is either generated or received, or in the case of the claims directed to a system, is both generated and received. It is this electronic form that constitutes the "vessel" in which the incoming information is contained. It is this electronic form that is then appropriately stored in a central database in a manner such that all forms associated with a particular product, or all forms associated with a particular work routine are stored in a

table that is specifically related to that product or work routine. The aforementioned scanning which takes place, therefore, is scanning of a table that has already been created based on the electronic forms themselves. This is significantly different from the electronic associations and word searchings that are described in the Ayyadurai reference at column 5, lines 40-51, that form the basis for the clustering or classification in the Ayyadurai method and apparatus. This aggressive and complicated technique is necessitated in the Ayyadurai reference precisely because of the nature of the incoming information, namely random messages and emails from any source. There is no disclosure in the Ayyadurai reference to initially "refine" or categorize the incoming information by the use of an electronic form, as disclosed and claimed in the present application.
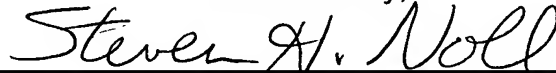
The method and system disclosed and claimed in the present application allow a very economical and streamlined evaluation, for improvements, of products and work routines. The use of the forms allows the improvement to proceed in a focused manner, by providing a way for the incoming information, in the electronic forms, to be quickly and easily stored in respective tables, so that it is only each table that must then be scanned to appropriately route the information therein.

The Ayyadurai reference, therefore, does not disclose or suggest acquiring incoming information by the use of electronic forms, storing the incoming information in tables respectively dependent on the information in the incoming electronic forms, and routing the stored information from a particular table, after scanning, to an appropriate address. The Ayyadurai

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reference, therefore, does not anticipate any of independent claims 1, 8, 13 and 18. The dependent claims that remain in the application, that respectively depend from independent claims 1, 8, 13 and 18, add further method steps, or further structure, to the novel method or system of the independent claims, and therefore are not anticipated by the Ayyadurai reference for the same reasons discussed above in connection with the independent claims.

All claims of the application are therefore submitted to be in condition for allowance, and early reconsideration of the application is therefore respectfully requested.

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